

EXHIBIT A

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

LOUIS BATTISTI and ANNA MARIA BATTISTI,
his wife,

CIVIL DIVISION

Plaintiff,

CASE NUMBER: **GD-21-9807**

vs.

PARKER HANNIFIN CORPORATION,

TYPE OF PLEADING:
**INTERROGATORIES IN AID
OF PREPARING COMPLAINT**

Defendant.

FILED ON BEHALF OF:
Plaintiffs

COUNSEL OF RECORD:
Carl R. Schiffman, Esquire
Pa. I.D. #23626

SCHIFFMAN FIRM, LLC
1300 Fifth Avenue
Pittsburgh, PA 15219
412-288-9444

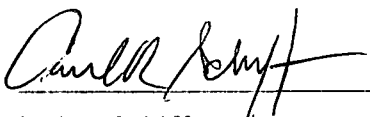
FIRM I.D. #466
carl@schiffmanfirm.com

FILED

2021 AUG 19 AM 9:09

DEPT. OF JUDICIAL SERVICES
CIVIL/FAMILY DIVISION
ALLEGHENY COUNTY PA

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.



Carl R. Schiffman

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA
CIVIL DIVISION

LOUIS BATTISI and ANNA MARIA BATTISTI, NO:
his wife,

Plaintiffs,

vs.

PARKER HANNIFIN CORPORATION,

Defendant.

INTERROGATORIES IN AID OF PREPARING COMPLAINT

AND NOW, comes Plaintiffs by and through their attorneys, Schiffman Firm, LLC and Carl R. Schiffman, Esquire and pursuant to the applicable Rules of Court, you are required to make full and complete Answers to the questions set forth in the following pages. These Answers must be made in writing, under oath, within thirty (30) days after service upon you.

DEFINITIONS AND INSTRUCTIONS

Unless negated by the context of the interrogatory, the following definitions are to be considered to be applicable to all interrogatories contained herein:

A. "Documents" is an all-inclusive term referring to any writing and/or recorded or graphic matter, however, produced or reproduced. The term "documents" includes, without limitation, correspondence, memoranda, interoffice communications, minutes, reports, notes, schedules, analyses, drawings, diagrams, tables, graphs, charts, maps, surveys, books of account, ledgers, invoices, purchase orders, pleadings, questionnaires, contracts, bills, checks, drafts, diaries, logs, proposals, print-outs, recordings, telegrams, films, tax returns, and financial statements, and all other such documents tangible or retrievable of any kind. "Documents" also include any preliminary notes and drafts of all the foregoing, in whatever form, for example, printed, typed, longhand, shorthand, on paper, paper tape, tabulating cards, ribbon blueprints, magnetic tape, microfilm, film, motion picture film, phonograph records, or other form.

B. With respect to documents, the term "identify means to give the date, title, author and addressee; "identify" with respect to documents further means:

- (I) To describe a document sufficiently well to enable the interrogator to know what such document is and to retrieve it from a file or wherever it may be located;
- (ii) To describe it in a manner suitable for use as a description in a subpoena;
- (iii) To give the name, address, position or title of the person(s) who has custody of the documents and/or copies thereof.

C. "Identify" when used in reference to an individual means:

- (i) To state his/her full name;
- (ii) Present residence address or last known residence;
- (iii) Present or last known business address;
- (iv) Present employer or last known employer;
- (v) Whether ever employed by any party to this action, and if, so, the dates he/she was employed by such party, the name of such party, and the last position held as an employee of such party.

D. Whenever the expression "and/or" is used in these interrogatories, the information called for should be set out both in the conjunctive, and disjunctive, and wherever the information is set out in the disjunctive, it should be given separately for each and every element sought.

E. No answer is to be left blank. If the answer to an interrogatory or subparagraph of an interrogatory is "none" or "unknown", such statement must be written in the answer. If the question is inapplicable, "N/A" must be written in the answer. If an answer is omitted because of the claim of privilege, the basis of privilege is to be stated.

F. These interrogatories are continuing, and any information secured subsequent to the filling of your answers which would have been included in the answers had it been known or available, are to be supplied by supplemental answers.

BRIEF STATEMENT OF THE CAUSE OF ACTION

On or about July 1, 2020, Plaintiff Louis Battisti and another worker were diagnosing a problem with a Test-Fuchs hydraulic ground power unit while in the course of his employment at the American Airlines facility at the Pittsburgh International Airport. Four hydraulic hoses were connected between the supply and return of the machine, Skydol fluid was added to the reservoir and the machine started. Louis Battisti opened the valve and stepped back when, suddenly and without warning, a hose ruptured causing Skydol fluid to be sprayed over a large area. He slipped on the Skydol coating on the floor and struck his back and head causing him to sustain serious injuries and damages.

Photographs of the hose which ruptured are attached hereto and marked "Exhibit A."

INTERROGATORIES

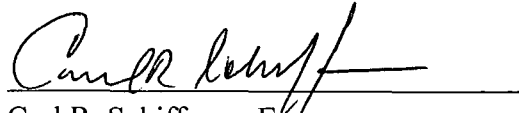
1. Identify the hose depicted in "Exhibit A" stating its model number, capacity, psi rating, and applications for which this model and/or type of hose is to be used.

ANSWER:

2. Kindly provide a copy of all information regarding the model or type of hose depicted in "Exhibit A" which is provided to the purchasers of this model or type of hose.

ANSWER:

Respectfully submitted,
SCHIFFMAN FIRM, LLC

A handwritten signature in black ink, appearing to read "Carl R. Schiffman", is written over a horizontal line.

Carl R. Schiffman, Esq.
Counsel for Plaintiffs

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

LOUIS BATTISTI and ANNA MARIA
BATTISTI, his wife

Plaintiff,

vs.

PARKER HANNIFIN CORPORATION

Defendant.

CIVIL DIVISION

CASE NUMBER: GD 21-009807

Filed on behalf of:
Louis Battisti and Anna Maria
Battisti, his wife

Type of Pleading:
AFFIDAVIT OF SERVICE

COUNSEL OF RECORD:
Carl R. Schiffman, Esquire
Pa. I.D. #23626

SCHIFFMAN FIRM, LLC
1300 Fifth Avenue
Pittsburgh, PA 15219
Ph: 412-288-9444
Fx: 412-288-9455

carl@schiffmanfirm.com

FILED

2021 SEP 15 PM 2:02

DEPT OF COURT RECORDS
CIVIL/FAMILY DIVISION
ALLEGHENY COUNTY PA

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.


Carl R. Schiffman

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

LOUIS BATTISTI and ANNA MARIA
BATTISTI, his wife

CIVIL DIVISION

Plaintiff,

CASE NUMBER: GD 21-009807

vs.

PARKER HANNIFIN CORPORATION


Defendant.

AFFIDAVIT OF SERVICE

I, the undersigned, Carl R. Schiffman, Esquire, hereby certified that a WRIT OF SUMMONS and INTERROGATORIES IN AID OF PREPARING A COMPLAINT were mailed to the Defendant Parker Hannifin Corporation at 6035 Parkland Boulevard, Cleveland, OH 44124 via U.S. Mail, certified mail, return receipt, postage prepaid on September 1, 2021. The return receipt is attached hereto, made a part hereof and marked as Exhibit "A"

Respectfully submitted,

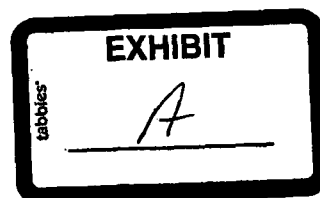
SCHIFFMAN FIRM, LLC

A handwritten signature in black ink, appearing to read 'Carl R. Schiffman', is written over a horizontal line.

Carl R. Schiffman, Esq.
Attorney for Plaintiffs

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY																	
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>A. Signature <input checked="" type="checkbox"/> <i>[Signature]</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>																	
<p>1. Article Addressed to:</p> <p><i>Parker Hannifin Corporation</i> <i>ATTN: Management</i> <i>6035 Parkland Blvd.</i> <i>Cleveland, OH 44124</i></p>		<p>B. Received by (Printed Name) <i>[Signature]</i> C. Date of Delivery <i>9-1-21</i></p>																	
<p>2. Article Number (Transfer from service label)</p> <p>7019 1120 0000 5368 5725</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>																	
<p>9590 9402 6061 0125 2017 58</p>		<p>3. Service Type</p> <table border="0"> <tr> <td><input type="checkbox"/> Adult Signature</td> <td><input type="checkbox"/> Priority Mail Express®</td> </tr> <tr> <td><input type="checkbox"/> Adult Signature Restricted Delivery</td> <td><input type="checkbox"/> Registered Mail™</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail®</td> <td><input type="checkbox"/> Registered Mail Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail Restricted Delivery</td> <td><input checked="" type="checkbox"/> Return Receipt for Merchandise</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery</td> <td><input type="checkbox"/> Signature Confirmation™</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery Restricted Delivery</td> <td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Insured Mail</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Mail Restricted Delivery</td> <td></td> </tr> </table>		<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®	<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™	<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery	<input type="checkbox"/> Certified Mail Restricted Delivery	<input checked="" type="checkbox"/> Return Receipt for Merchandise	<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation™	<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery	<input type="checkbox"/> Insured Mail		<input type="checkbox"/> Mail Restricted Delivery	
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PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt





Allegheny County Court of Common Pleas

Fill out form and save a copy to email to the Court with your Motion.

The filename of the form should be the GD number of your case.

Remote Discovery

Motion Form

Fields in red MUST be completed.

Motions with incomplete/no form **WILL NOT BE HEARD** Completed forms MUST accompany ALL Discovery Motions. All parties must be CC'd. Completed forms and accompanying motions must be emailed to:

civildiscmotions@alleghenycourts.us

You will be assigned a date and time via email.

Has this Matter ON or EVER BEEN ON a Trial List? ☐ Yes ☒ No

If "Yes" then the Motion **MUST** go to Calendar Control Judge

Louis Battisti and Anna Maria
Battisti, his wife

GD Number: GD 21-009807

☒ Contested ☐ Uncontested

(If you are unsure select CONTESTED)

Plaintiff(s),

v.

Parker Hannifin Corporation

Motion Title (i.e. Motion to Compel):

Motion to Compel Answers to
Interrogatories in Aid of Preparing a
Complaint

Defendant(s).

Notes/Additional Party Contact Information*:

Plaintiff/Counsel Contact Info*:

Carl R. Schiffman, Esq.
Schiffman Firm, LLC
1300 Fifth Ave.
Pittsburgh, PA 15219
412/2889444
carl@schiffmanfirm.com

Defendant/Counsel Contact Info*:

Parker Hannifin Corporation 6035
Parkland Blvd.
Cleveland, OH 44124
216/896-3000
email: Unknown

**APPROPRIATE SERVICE MUST BE
PROVIDED
ACCORDING TO PROCEDURES LOCATED IN
THE DISCOVERY SECTION OF THE CIVIL
DIVISION WEBSITE**

***Contact information must include an email address as well as a personal contact number for the party.**
If a party wishes to use their firm contact information on a filing in lieu of personal contact information. Personal contact information MUST be placed in the email to the Court.

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

LOUIS BATTISTI and ANNA MARIA
BATTISTI, his wife

Plaintiff,

vs.

PARKER HANNIFIN CORPORATION

Defendant.

CIVIL DIVISION

CASE NUMBER: GD 21-009807

Filed on behalf of:
Louis Battisti and Anna Maria
Battisti, his wife

Type of Pleading:
MOTION TO COMPEL

COUNSEL OF RECORD:
Carl R. Schiffman, Esquire
Pa. I.D. #23626

SCHIFFMAN FIRM, LLC
1300 Fifth Avenue
Pittsburgh, PA 15219
Ph: 412-288-9444
Fx: 412-288-9455

carl@schiffmanfirm.com

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.


Carl R. Schiffman

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

LOUIS BATTISTI and ANNA MARIA
BATTISTI, his wife

CIVIL DIVISION

Plaintiff,

CASE NUMBER: GD 21-009807

vs.

PARKER HANNIFIN CORPORATION

Defendant.

MOTION TO COMPEL

AND NOW, come the Plaintiffs, Louis Battisti and Anna Maria Battisti, his wife, by and through their counsel, Schiffman Firm, LLC and Carl R. Schiffman, Esquire and aver the following:

1. On or about July 1, 2020, Plaintiff Louis Battisti was working at the American Airlines facility at Pittsburgh International Airport and was attempting to repair a Test Fuchs hydraulic ground power unit when, suddenly, a hose burst and spewed Skydol fluid onto the ground causing him to slip and be seriously injured.
2. The within action was commenced by a Writ of Summons filed on August 19, 2021.
3. Defendant was served with the Writ of Summons and Interrogatories in Aid of Preparing a Complaint on September 1, 2021.
4. Defendant's answers to the Interrogatories were due on October 1, 2021.
5. To date, Defendant has failed to file answers or objections to the Interrogatories in Aid of Preparing a Complaint.
6. The information requested in the Interrogatories is known to the Defendant and not burdensome to obtain and provide.

7. This information could be necessary and could lead to filings by the Plaintiff against an additional party or parties responsible for Plaintiffs' injuries and damages.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court enter an Order requiring Defendant Parker Hannifin Corporation provide complete answers to Interrogatories in Aid of Preparing a Complaint within twenty (20) days of the date of the Order.

Respectfully submitted,

SCHIFFMAN FIRM, LLC




Carl R. Schiffman, Esq.
Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Plaintiffs' Motion to Compel prepared on behalf of the Plaintiffs has been served upon the individual(s) listed below, via first class mail, postage prepaid, on October 19, 2021.

Parker Hannifin Corporation
Attn: Management
6035 Parkland Blvd.
Cleveland, OH 44124
(Defendant)



Carl R. Schiffman, Esquire
Counsel for Plaintiffs

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

LOUIS BATTISTI and ANNA MARIA
BATTISTI, his wife

CIVIL DIVISION

Plaintiff,

CASE NUMBER: GD 21-009807

vs.

PARKER HANNIFIN CORPORATION

Defendant.

ORDER OF COURT

AND NOW TO WIT, this _____ day of _____, it is
HEREBY ORDERED, ADJUDGED and DECREED that Plaintiff's Motion to Compel Answers
to Interrogatories in Aid of Preparing a Complaint Directed to Parker Hannifin Corporation is
GRANTED and Defendant is to provide full and complete answers to the Interrogatories in Aid
of Preparing a Complaint within twenty (20) days of the date of this Order or suffer such
sanctions as deemed appropriate by this Court.

By the Court:

_____. J.

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

LOUIS BATTISTI and ANNA MARIA
BATTISTI, his wife

CIVIL DIVISION

Plaintiff,

CASE NUMBER: GD 21-009807

vs.

PARKER HANNIFIN CORPORATION

Defendant.

ORDER OF COURT

FILED
2021 NOV 10 11 04 AM
CLERK OF COURT

AND NOW TO WIT, this 10th day of November, it is
HEREBY ORDERED, ADJUDGED and DECREED that Plaintiff's Motion to Compel Answers
to Interrogatories in Aid of Preparing a Complaint Directed to Parker Hannifin Corporation is
GRANTED and Defendant is to provide full and complete answers to the Interrogatories in Aid
of Preparing a Complaint within twenty (20) days of the date of this Order or suffer such
sanctions as deemed appropriate by this Court.

By the Court:

Philip C. Greer, Jr.

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

LOUIS BATTISTI and ANNA MARIA BATTISTI,
his wife,

Plaintiff,

vs.

PARKER HANNIFIN CORPORATION,

Defendant.

CIVIL DIVISION


CASE NUMBER: 21-009807

TYPE OF PLEADING:
COMPLAINT

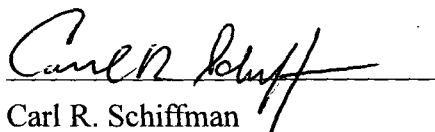
FILED ON BEHALF OF:
Plaintiffs

COUNSEL OF RECORD:
Carl R. Schiffman, Esquire
Pa. I.D. #23626
carl@schiffmanfirm.com

Daniel S. Schiffman, Esq.
Pa. I.D. #309825
dan@schiffmanfirm.com

SCHIFFMAN FIRM, LLC
1300 Fifth Avenue
Pittsburgh, PA 15219
412-288-9444

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.


Carl R. Schiffman

FILED

2022 MAR 24 PM 3:33

DEPT. OF COURT RECORDS
CIVIL FAMILY DIVISION
ALLEGHENY COUNTY

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA
CIVIL DIVISION

LOUIS BATTISI and ANNA MARIA BATTISTI,
his wife,

NO: 21-009807

Plaintiffs,

vs.

PARKER HANNIFIN CORPORATION,

Defendant.

NOTICE TO DEFEND

YOU HAVE BEEN SUED IN COURT. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served by entering a written appearance personally or by attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so, the case may proceed without further notice for any money claimed in the Complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR PHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

ALLEGHENY COUNTY LAWYER REFERRAL SERVICE

The Allegheny County Bar Association

400 Koppers Bldg.

436 7th Avenue, 3rd Floor

Pittsburgh, PA 15219

(412) 261-5555

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA
CIVIL DIVISION

LOUIS BATTISI and ANNA MARIA BATTISTI,
his wife,

NO: 21-009807

Plaintiffs,

vs.

PARKER HANNIFIN CORPORATION,

Defendant.

COMPLAINT

AND NOW, come Plaintiffs, Louis Battisti and Anna Maria Battisti, his wife, by and through their counsel Schiffman Firm LLC and Carl R. Schiffman, Esquire and file the within Complaint and in support thereof aver the following:

1. Plaintiff Louis Battisti is an individual and a resident of the Commonwealth of Pennsylvania and County of Beaver residing at 238 Columbia Drive, Aliquippa, Pennsylvania 15001.

2. Plaintiff Anna Maria Battisti is an individual and a resident of the Commonwealth of Pennsylvania and County of Beaver and is the wife of Plaintiff Louis Battisti residing with him as such at 238 Columbia Drive, Aliquippa, Pennsylvania 15001.

3. The Defendant Parker Hannifin Corporation is a corporation with headquarters located at 6035 Parkland Boulevard, Cleveland, Ohio, 44124 which at all relevant times traded and did business in the Commonwealth of Pennsylvania, which conducted substantial, systematic, and/or continuous activities within the Commonwealth of Pennsylvania and which placed its products into the stream of commerce in Pennsylvania and in the County of Allegheny.

4. On or about July 1, 2020, Plaintiff Louis Battisti was working in the course of his employment at the American Airlines facility at the Pittsburgh International Airport.

5. At the above stated date and place, Plaintiff and another worker were diagnosing a problem using a Test-Fuchs hydraulic ground power unit.

6. Four hydraulic hoses were connected between the supply and return of the hydraulic ground power unit, with a valve located between the supply and return.

7. Skydrol fluid was added to the reservoir and the hydraulic ground power unit was started.

8. Plaintiff Louis Battisti opened the valve in the line set, stepped back from the valve, and, suddenly and without warning, one of the hoses ruptured causing Skydrol fluid to be sprayed over a large area.

9. Plaintiff Louis Battisti slipped on the Skydrol coating on the floor and fell rearward striking his back and head and sustaining serious injuries and damages.

COUNT I

LOUIS BATTISTI v. PARKER HANNIFIN CORPORATION

10. Plaintiff hereby incorporates by reference the averments contained in previous paragraphs of this Complaint as though the same were more fully set forth at length herein.

11. At all times relevant to this action, the Defendant was engaged in the business of designing, manufacturing, selling and/or supplying hydraulic hoses and was a seller as defined by the Restatements (Second) of Torts.

12. The hydraulic hose was designed, manufactured, sold, and/or supplied by Defendant.

13. The hydraulic hose was expected to and did reach the Plaintiff and was used by him without substantial change in the condition in which it was sold.

14. The Defendant breached the duties owed to the Plaintiffs as mandated by selling the hydraulic hose in a defective condition to the ultimate user of the product.

15. The hydraulic hose was defective in that it failed to be properly packaged, properly labeled and/or have proper warnings.

16. The hydraulic hose was defective because it failed to contain appropriate and/or proper labels, writings, or directions which advised users regarding its pressure rating.

17. The hydraulic hose was further defective because the risk posed by its design and manufacture greatly exceeded the utility, if any, of its design.

18. The hydraulic hose was further defective because it did not meet the reasonable expectations of an ordinary consumer.

19. As the direct, legal and proximate result of the breach of the mandates of strict product liability law, this Plaintiff has sustained the following injuries and damages:

- a. Thoracic spine fracture;
- b. Necessity of medical treatment including hospitalization and surgery;
- c. Pain and suffering;
- d. Medical bills and/or liens;
- e. Inability to enjoy the ordinary pleasures of life and perform normal daily activities;
- f. Loss of wages and impairment of earning capacity;
- g. Disfigurement; and
- h. Other serious injuries and damages.

WHEREFORE, Plaintiff Louis Battisti hereby demands judgment in his favor and against the Defendant Parker Hannifin Corporation for an amount in excess of applicable Arbitration Limits exclusive of interest and costs.

COUNT II

LOUIS BATTISTI v. PARKER HANNIFIN CORPORATION

20. Plaintiff hereby incorporates by reference the averments contained in previous paragraphs of this Complaint as though the same were more fully set forth at length herein.

21. The Defendant was negligent in the following particulars:

- a. In designing, manufacturing, distributing and/or selling the hydraulic hose without a permanently affixed label advising of the pressure rating;
- b. In designing, manufacturing, distributing and/or selling the hydraulic hose with no clear indication of the pressure rating;
- c. In failing to use due care to assure that the hydraulic hose could be safely and effectively utilized;
- d. In failing to warn of the dangers of the hydraulic hose;
- e. In selling the product in such a condition that a user would not know whether it was appropriate for use as a high pressure hydraulic hose;
- f. In failing to provide all accouterments and features necessary to render the hydraulic hose safe for use;
- g. In failing to assure that the hydraulic hose was in the condition in which it was sold was appropriate for the uses to which it would be put; and
- h. In designing, manufacturing, and/or selling or distributing a defective product as previously set forth.

22. As the direct, legal and proximate result of the negligence of the Defendant as aforesaid, Plaintiff Louis Battisti has sustained the injuries and damages previously set forth.

WHEREFORE, Plaintiff Louis Battisti hereby demands judgment in his favor and against the Defendant Parker Hannifin Corporation for an amount in excess of applicable Arbitration Limits exclusive of interest and costs.

COUNT III


ANNA MARIA BATTISTI v. PARKER HANNIFIN CORPORATION

23. Plaintiff hereby incorporates by reference the averments contained in the previous paragraphs of this Complaint as though the same were more fully set forth at length herein.

24. As the direct, legal, and proximate result of the breaches of the mandates of §402A by this Defendant and/or of the negligence of this Defendant as aforesaid, this Plaintiff has been deprived of the services, assistance, society, and consortium of her husband, Plaintiff Louis Battisti.

WHEREFORE, Plaintiff Anna Maria Battisti hereby demands judgment in her favor and against the Defendant Parker Hannifin Corporation for an amount in excess of the applicable arbitration limits, exclusive of interest and costs.

RESPECTFULLY SUBMITTED:
SCHIFFMAN FIRM, LLC

By: 
Carl R. Schiffman
Attorney for Plaintiffs

VERIFICATION

The undersigned, Louis Battisti and Anna Maria Battisti, his wife, named herein, and being authorized to make this Verification for and on their behalf, having read the foregoing **COMPLAINT** verify that the averments are based on information furnished to counsel, which information has been gathered by counsel in the course of this lawsuit. The language is that of counsel and not of signers. Signers verify that they have read the foregoing, and that it is true and correct to the best of signers' knowledge, information and belief. To the extent that the contents of the foregoing document are that of counsel, verifiers have relied upon counsel in making this verification. This verification is made subject to the penalties of 18 PA C.S.A. § 4904, relating to unsworn falsification to authorities.

Date 2/22/2022

Luis Battisti
Louis Battisti

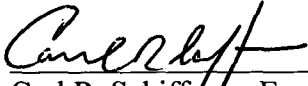
Date: 2/22/2022

Anna Maria Battisti
Anna Maria Battisti

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Plaintiffs' COMPLAINT prepared on behalf of the Plaintiffs has been served upon the individual(s) listed below, via email on this 22^d day of March.

Thomas W. Baker, Esquire
Parker Hannifin Corporation
Corporate Legal Department
6035 Parkland Blvd.
Cleveland, OH 44124-4141
Thomas.baker@parker.com
(Counsel for Defendant)


Carl R. Schiffman, Esquire
Counsel for Plaintiffs

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

LOUIS BATTISTI and ANNA MARIA BATTISTI,
his wife,

Plaintiff,

vs.

PARKER HANNIFIN CORPORATION,
Defendant.

CIVIL DIVISION

CASE NUMBER: **GD-21-9807**

TYPE OF PLEADING:
**PRAECIPE FOR
WRIT OF SUMMONS**

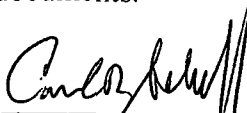
FILED ON BEHALF OF:
Plaintiffs

COUNSEL OF RECORD:
Carl R. Schiffman, Esquire
Pa. I.D. #23626

SCHIFFMAN FIRM, LLC
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412-288-9444

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I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.



Carl R. Schiffman

OPS\$KRISTOPHER1
19 August 2021
9:13:26
GD-21-009807

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA
CIVIL DIVISION

LOUIS BATTISI and ANNA MARIA BATTISTI,
his wife,

NO:

Plaintiffs,

vs.

PARKER HANNIFIN CORPORATION,

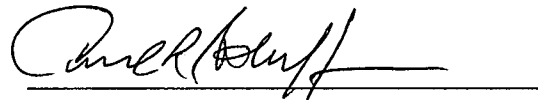
Defendant.

PRAECIPE FOR WRIT OF SUMMONS

To Prothonotary:

Please issue a writ of summons for the above captioned defendant.

Respectfully submitted,
SCHIFFMAN FIRM, LLC

A handwritten signature in black ink, appearing to read 'Carl R. Schiffman', is written over a horizontal line.

Carl R. Schiffman, Esq.
Counsel for Plaintiffs

Supreme Court of Pennsylvania

Court of Common Pleas
Civil Cover Sheet

Allegheny

County

For Prothonotary Use Only:

Docket No:

The information collected on this form is used solely for court administration purposes. This form does not supplement or replace the filing and service of pleadings or other papers as required by law or rules of court.

SECTION

Commencement of Action:

- ☐ Complaint ☒ Writ of Summons ☐ Petition
☐ Transfer from Another Jurisdiction ☐ Declaration of Taking

Lead Plaintiff's Name:

Louis Battisti

Lead Defendant's Name:

Parker Hannifin Corporation

Are money damages requested? ☒ Yes ☐ NoDollar Amount Requested: ☐ within arbitration limits
(check one) ☒ outside arbitration limitsIs this a *Class Action Suit*? ☐ Yes ☐ NoIs this an *MDJ Appeal*? ☐ Yes ☐ No

A

Name of Plaintiff/Appellant's Attorney: Carl R. Schiffman, Esq.

☐ Check here if you have no attorney (are a Self-Represented [Pro Se] Litigant)

Nature of the Case: Place an "X" to the left of the ONE case category that most accurately describes your **PRIMARY CASE**. If you are making more than one type of claim, check the one that you consider most important.

SECTION

TORT (do not include Mass Tort)

- ☐ Intentional
☐ Malicious Prosecution
☐ Motor Vehicle
☐ Nuisance
☐ Premises Liability
☒ Product Liability (does not include mass tort)
☐ Slander/Libel/ Defamation
☐ Other: _____

CONTRACT (do not include Judgments)

- ☐ Buyer Plaintiff
☐ Debt Collection: Credit Card
☐ Debt Collection: Other _____
☐ Employment Dispute: Discrimination
☐ Employment Dispute: Other _____
☐ Other: _____

CIVIL APPEALS

- Administrative Agencies
☐ Board of Assessment
☐ Board of Elections
☐ Dept. of Transportation
☐ Statutory Appeal: Other _____

- ☐ Zoning Board
☐ Other: _____

B

MASS TORT

- ☐ Asbestos
☐ Tobacco
☐ Toxic Tort - DES
☐ Toxic Tort - Implant
☐ Toxic Waste
☐ Other: _____

REAL PROPERTY

- ☐ Ejectment
☐ Eminent Domain/Condemnation
☐ Ground Rent
☐ Landlord/Tenant Dispute
☐ Mortgage Foreclosure: Residential
☐ Mortgage Foreclosure: Commercial
☐ Partition
☐ Quiet Title
☐ Other: _____

MISCELLANEOUS

- ☐ Common Law/Statutory Arbitration
☐ Declaratory Judgment
☐ Mandamus
☐ Non-Domestic Relations Restraining Order
☐ Quo Warranto
☐ Replevin
☐ Other: _____

PROFESSIONAL LIABILITY

- ☐ Dental
☐ Legal
☐ Medical
☐ Other Professional: _____